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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 17-091

#### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated December 2014.]**

#### **1. Statutory Authority**

Section 448.54, Stats., should be added as a statute interpreted by the rule.

#### **2. Form, Style and Placement in Administrative Code**

a. It appears that the term “professional competency”, which is defined in proposed s. PT 9.02 (4m), is only used in s. PT 9.04 (1) (a). The board could consider deleting the definition and instead incorporating its requirements directly into s. PT 9.04 (1) (a).

b. The proposed treatment of s. PT 9.04 (3) (intro.) should be removed from SECTION 8 of the rule and placed instead in a SECTION that follows the treatment of Table PT 9.04.

c. For clarity, the board could consider revising the contact hour limits in Table PT 9.04 to state for example that “One semester credit equals 10 contact hours, and one quarter credit equals 6.6 contact hours.”.

d. For consistency, the contact hour limit in Table PT 9.04 (p) could also be revised to state “One contact hour” rather than “1 contact hour”.